## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,	
Plaintiff,	No. 19 CR 567
-VS-	Hon. Harry D. Leinenweber
ROBERT SYLVESTER KELLY, also known As "R.Kelly," DERREL MCDAVID, and MILTON BROWN, also known as "June Brown."	
Defendants.	

## **DECLARATION OF ROBERT S. KELLY**

I, ROBERTS. KELLY, declare under penalty of perjury:

- 1. I am the Defendant in the above-captioned matter.
- 2. I am aware that my attorney filed a motion for severance in this case after numerous conversations with me and she has read the motion to me.
- I was represented by Ed Genson for many years in connection with an
  investigation and eventual child pornography charges brought against me by the office the Cook
  County State's Attorney in the 2000s.
- Mr. Genson (and his partners/associates/colleagues) represented me at trial on those charges that ended with an acquittal on June 13, 2008.
- 5. After that acquittal, I maintained an attorney-client relationship with Mr. Genson for at least a decade, including between 2012 and 2018 which included regular consultation about legal matters in my life that came up on a frequent basis.

- 6. I am also familiar with the Sun Times Article in which Mr. Genson was interviewed before his death. Without getting into detail, Mr. Genson revealed attorney-client privileged communications in that interview that I did not authorize.
- 7. I did not file a complaint against Mr. Genson with the ARDC, and the ARDC never contacted me to discuss Mr. Genson's comments to the Sun Times. I have no idea whether the ARDC ever conducted an investigation in an violations of the rules of professional responsibility by Mr. Genson.
- 8. Although I do not have a specific memory of ever consulting with Vadim Glozman. I have a distinct memory of his name as someone who worked with Mr. Genson during the time that I continued to consult with Mr. Genson about legal matters following my 2008 acquittal.

I declare under penalty of perjury under the law of the United States of American that the foregoing is true and correct. Executed on May 21, 2022

ROBERTS, KELLY